

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

This Document Relates to:

*B.L. v. Uber Technologies, Inc., et al.*,  
No. 24-cv-7940

Under Civil Local Rules 7-11 and 79-5(f), Plaintiff moves the Court to consider whether material designated confidential by Uber should be sealed.

On August 22, 2025, Plaintiff B.L. filed a motion for leave to amend her bellwether complaint. Plaintiffs' motion refers to and attaches documents that Uber designated "CONFIDENTIAL" or "ATTORNEYS' EYES ONLY" under the stipulated protective order.

**Material To Be Filed Under Seal**

The material to be filed under seal is portion of Plaintiffs' motion, portions of the declaration in support, and the attached exhibits:

Document	Description	Designating Party
[Unredacted] Plaintiff's Motion for Leave to Amend	Portion of briefing referring to documents designated confidential	Uber
[Unredacted] Luther Declaration	Portion of declaration referring to documents designated confidential	
Exhibit D	Uber's Responses to Plaintiff's Requests for Admission	Uber
Exhibit E	Excerpts of 7/10/25 Nilles Deposition	Uber
Exhibit F	Excerpts of 8/7/25 Nilles Deposition	Uber
Exhibit G	Document produced by Uber	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Andrew R. Kaufman in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: August 22, 2025

Respectfully submitted,

By: /s/ Sarah R. London

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**FILER'S ATTESTATION**

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: August 22, 2025

By: /s/ Andrew R. Kaufman  
Andrew R. Kaufman